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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TIARE RAMIREZ, an individual;

Plaintiff,

vs.

WYNN LAS VEGAS, LLC; DOES I through
X; and ROE Corporations XI through XX,
inclusive;

Defendant.

Case No: 2:19-cv-01174-APG-DJA

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**

(First Request)

STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES

The parties, by and through their respective counsel of record, hereby stipulate and request that the deadline to complete discovery, and all corresponding deadlines in the Court's Scheduling Order (ECF No. 16), be extended by sixty (60) days.

A. DISCOVERY COMPLETED:

Both parties have exchanged their initial disclosures required under Fed. R. Civ. P. 26(a)(1)(A). Plaintiff served her initial disclosures on September 9, 2019 and her first supplemental disclosures on November 1, 2019. Defendant served its initial disclosures on September 10, 2019 and its first supplemental disclosures on November 1, 2019. Defendant responded to Plaintiff's first sets of interrogatories and requests for production of documents on November 1, 2019. Plaintiff responded to Defendant's first sets of interrogatories and requests for production of documents on November 1, 2019.

1 **B. STATEMENT SPECIFYING THE DISCOVERY THAT REMAINS TO BE**
2 **COMPLETED**

3 Plaintiff anticipates taking the deposition of Defendant Wynn Las Vegas, LLC
4 pursuant to Federal Rule of Civil Procedure 30(b)(6). Plaintiff also anticipates taking the
5 depositions of individuals with knowledge of the facts and circumstances surrounding
6 the allegations in the Complaint. Such individuals are anticipated to include Jeralynn
7 Makaiwi, Karen Sanchez, Melissa Espino-Cascos, and Tia Gibson.

8 Defendant anticipates taking the deposition of Plaintiff Tiare Ramirez and her
9 treating physician, Dr. Ted Cohen.

10 **C. THE REASONS WHY DISCOVERY WAS NOT COMPLETED WITHIN**
11 **THE TIME LIMITS SET BY THE DISCOVERY PLAN**

12 The original close of discovery was to take place on April 10, 2020. ECF No. 16,
13 p. 2.

14 On February 14, 2020 (Valentine's Day), Plaintiff's lead counsel's immediate
15 family member suffered a medical emergency, requiring intubation. Such individual
16 remains in the intensive care unit. This family emergency has necessarily required a
17 great deal on Plaintiff's lead counsel's time and attention. Defendant's counsel has
18 graciously agreed to this request to extend deadlines.

19 Further, following the granting in part and denying part (ECF No. 26, p. 5) of
20 Plaintiff's Motion to Quash Third Party Subpoenas (ECF No. 23), Plaintiff filed her
21 Objection to such Order (ECF No. 28). The parties await the Court's ruling on such
22 Objection regarding the extent to which the contested subpoenas must be modified
23 before being served.

24 In addition, the parties have been engaging in good faith discussions regarding
25 potential resolution of this matter. The parties have sought to conserve resources,
26 including avoiding potentially unnecessary fees and costs, should the parties achieve
27 resolution.

28 This request is not sought for any improper purpose or other reason of delay. No
 party is prejudiced by the requested extension.

D. **PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING
DISCOVERY:**

1. **Discovery Cut-Off**

The discovery cut-off shall be extended from April 10, 2020 to **Tuesday, June 9, 2020.**

2. **Amending the Pleadings and Adding Parties**

The deadline to move to amend the pleadings and parties has closed. No such request to amend the pleadings and parties is requested.

3. **Expert Disclosure**

The deadline to name initial experts has closed. No such request to disclose experts or rebuttal experts is requested.

4. **Dispositive Motions**

In accordance with Local Rule 26-1(b)(4), the last day for filing dispositive motions including, but not limited to motions for summary judgment, shall be extended from May 11, 2020 to **Friday, July 10, 2020.**

5. **Pre-Trial Order**

In accordance with Local Rule 26-1(b)(5), the last day to file a Joint Pre-Trial Order, including any disclosures pursuant to FRCP 26(a)(3), shall be extended from June 10, 2020 to **Monday, August 10, 2020** (August 9, 2019 falls on a Sunday). In the event dispositive motions are filed, the date for filing the Joint Pre-Trial Order shall be suspended until thirty (30) days after the decision on the dispositive motions or upon further order by the Court extending the time period in which to file the Joint Pre-Trial Order.

6. **Fed. R. Civ. P. 26(a)(3) Disclosures**

If no dispositive motions are filed, and unless otherwise ordered by this Court, the parties shall file the disclosures required by Fed. R. Civ. P. 26(a)(3) and any objections thereto with the Pretrial Order pursuant to LR 26-1(e)(6) in the Joint Pretrial

Order, not more than thirty (30) days after the date set for filing dispositive motions and, therefore, not later than **Monday, August 10, 2020** (extended from June 10, 2020).

7. Interim Status Report

The parties previously submitted their interim status report (ECF No. 27) on February 10, 2020. No such request to file a second status report is requested.

8. Trial and Calendar Call

No trial has been set in this matter.

Dated this 27 Day of February 2020 Dated this 27 Day of February 2020

LITTLER MENDELSON, P.C.

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ORDER

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

Dated: February 28, 2020